

European Agency for Safety and Health at Work

# From policy to practice: Safety and Health in Micro and Small Enterprises in the EU

European Risk Observatory

National Report: Italy



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# 1 Description of the national context

This report describes the national context and situation of the current Italian occupational safety and health (OSH) system, and examines the challenges and national policies for micro and small enterprises (MSEs) with an impact on OSH.

In Italy, according to 2015 data from the National Institute for Statistics (ISTAT; Table 1), there are nearly 4,400,000 active enterprises in Italy, 99.4 % of which have fewer than 50 employees and an impressive proportion of which (95.4 %) have fewer than 10 employees.

Table 1 Number of active enterprises/establishments by size and sector in Italy, 2015

Sector (NACE Classification)	Size of enterprise/establishment (number of employees)				SUBTOTALS and GRAND TOTAL
	0-9	10-49	50-249	250+	
Total Italy	4,136,831	176,332	21,256	3,666	4,338,085
Manufacturing (C)	321,837	57,930	8,338	1,212	389,317
Construction (F)	492,388	17,897	1,040	80	511,405
Services (G) to (R)	3,103,688	94,669	10,963	2,171	3,211,491
SUBTOTALS and GRAND TOTAL	3,917,913	170,496	20,341	3,463	4,112,213
	90.3 %	3.9 %	0.5 %	0.1 %	94.8 %

  

Sector (NACE Classification)	Size of enterprise/establishment (number of employees)				SUBTOTALS and GRAND TOTAL
	0-9	10-19	50-249	250+	
Total Italy (%)	95.4 %	4.1 %	0.5 %	0.1 %	100.0 %
Manufacturing (C)	7.4 %	1.3 %	0.2 %	0.0 %	9.0 %
Construction (F)	11.4 %	0.4 %	0.0 %	0.0 %	11.8 %
Services (G) to (R)	71.5 %	2.2 %	0.3 %	0.1 %	74.0 %
SUBTOTALS and GRAND TOTAL	90.3 %	3.9 %	0.5 %	0.1 %	94.8 %

  

Sector (NACE Classification)	Size of enterprise/establishment (number of employees)				SUBTOTALS
	0-9	10-19	50-249	250+	
Total Italy (%)	95.4 %	4.1 %	0.5 %	0.1 %	100.0 %
Manufacturing (C)	82.7 %	14.9 %	2.1 %	0.3 %	100.0 %
Construction (F)	96.3 %	3.5 %	0.2 %	0.0 %	100.0 %

Services (G) to (R)	96.6 %	2.9 %	0.3 %	0.1 %	100.0 %
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Source: elaboration on data ISTAT ASIA Business Register, available at i.Stat, <http://dati.istat.it>

Regarding the distribution among sectors, manufacturing accounts for 9 %, construction for 11.8 %, and services ((NACE codes G to R)) for 74 % of active enterprises. As for enterprise size, that is, the number of employees, manufacturing accounts for a significant number of medium-sized (50-249 employees) and large enterprises (250+ employees) compared with construction and services, where micro-sized enterprises (0-9 employees) account for more than 96 %.

There are no figures available on the actual distribution of occupational accidents in MSEs versus medium-sized and large enterprises. However, a study by Micheli and Cagno (2010) showed that, based on a very large sample of injuries in a northern area of Italy (the Province of Lecco; data provided by the local branch of INAIL, the National Institute for Insurance against Accidents at Work), micro, small and medium-sized enterprises accounted for 94 % of reported OSH injuries, indicating, as a general result, a strong overrepresentation of these enterprises in terms of occupational accidents. In fact, in contrast to the situation regarding the number of companies, the proportion of employees employed in micro to medium-sized enterprises in Italy is well below 94 %, as shown in Table 2 (based on the last census, dating close to the year of the abovementioned publication (Micheli and Cagno, 2010)). Stemming from the same research, an estimation of 440,000 injuries within MSEs alone (which is staggering especially considering the general issue of underreporting OSH injuries among MSEs (EU-OSHA, 2016)), out of the total number 595,000 in the regional study, clearly indicates the significance of the OSH issue within MSEs in Italy.

Table 2 Number of employees by size of enterprise/establishment in Italy, 2011

CENSUS 2011	00-09	10-49	50-249	250+	SUBTOTALS
Total Italy	7,699,197	3,326,109	2,013,721	3,385,059	16,424,086
	46.9 %	20.3 %	12.3 %	20.6 %	100 %

Source: elaboration on data ISTAT Census of Industry and Services 2011, available at i.Stat, <http://dati.istat.it>

## 1.1 National strategy and programmes

National strategies and programmes for the prevention of accidents and occupational diseases are developed by the Steering and Evaluation Committee for Active Policies, which also coordinates surveillance activities related to safety and health at work, based on the data provided by the National Information System for Prevention (SINP, 'Sistema Informativo Nazionale per la Prevenzione' in Italian) in workplaces. SINP aims to provide information related to activities for the prevention of accidents at work and occupational diseases, and to address surveillance activities. The bodies involved are: the Ministry of Labour and Social Policies, the Ministry of Health, the Ministry of the Interior, Autonomous Regions, Autonomous Trento and Bolzano Provinces, INAIL (the National Institute for Insurance against Accidents at Work, usually referred to as the 'Italian workers' compensation authority', 'Istituto Nazionale per l'Assicurazione contro gli Infortuni sul Lavoro' in Italian), with the support of joint committees, sectoral bodies and institutions, and the CNEL (National Council for Economy and Labour, 'Consiglio Nazionale dell'Economia e del Lavoro' in Italian). The aims of the Steering and Evaluation Committee for Active Policies include setting common guidelines for national policies regarding health and safety at work; identifying objectives and programmes for the improvement of health and safety conditions; and

planning surveillance activities. A specific focus on 'small' and 'medium' (in general terms, thus including micro) enterprises is mentioned in the description of the committee's main functions<sup>1</sup>.

## 1.2 Bodies and actors involved at national level

### 1.2.1 OSH authorities and inspection

The OSH authorities with legislative power are the Ministry of Labour and Social Policies and the Ministry of Health at the national level; and the Autonomous Regions, Autonomous Trento and Bolzano Provinces at a local level, grouped as the Conference of Regions and Autonomous Provinces (in Italian *Conferenza delle Regioni e delle Province Autonome*). The Ministry of Labour and Social Policies, supported by the Ministry of Health, aims to build and disseminate a safety and prevention culture, and to foster activities and initiatives that contribute to the promotion of responsible behaviours among workers, so as to contribute to a decrease in the occurrence of accidents at work. The Ministry of Labour and Social Policies, sustained by social dialogue, is responsible for the legislative body related to OSH. The Conference of Regions and Autonomous Provinces mainly aims to enhance the dialogue with the national government (that is, the ministries) through the development of documents shared by the entire system of regional governments, and to establish and maintain a fruitful interregional dialogue in order to disseminate best practices.

As far as inspections are concerned, some of the staff of the Ministry of Labour and Social Policies used to perform inspection activities related to OSH, together with ASL (the local health authority, 'Azienda Sanitaria Locale' in Italian, also known by other names in the many different regions) and, regarding its specific competence, the national fire brigade. Since January 2017, the National Labour Inspectorate Agency (INL, 'Ispettorato Nazionale del Lavoro' in Italian) has been the agency — supported by ASL — that deals with labour inspections as far as OSH is concerned, thus replacing the Ministry of Labour and Social Policies, INPS (National Institute of Social Security, 'Istituto Nazionale Previdenza Sociale' in Italian, whose inspections were related to the assessment of post-accident workers' disability) and INAIL (whose inspections were related to compensation issues).

### 1.2.2 OSH services

#### Prevention and protection services

Based on the Legislative Decree of 9 April 2008, No 81, and subsequent amendments, better known as 'Testo Unico di salute e sicurezza sul lavoro' ('Consolidated Act on Occupational Health and Safety'), the employer organises a prevention and protection service (SPP, 'Servizio di Prevenzione e Protezione' in Italian) within the company or the production unit, or externally by appointing people or external services, established through employers' associations or joint organisations. The employer is given a relatively large degree of freedom in this choice, that is, regarding whether to organise the SPP internally, inside his or her own company or production unit, or whether to use external OSH services (however, some constraints exist, for instance if the number of employees is over 200, or according to a list of specific exceptions in the decree itself). The person responsible for the prevention and protection service and its representative (RSPP, 'Responsabile del Servizio Prevenzione e Protezione' in Italian) is principally responsible for performing a full risk assessment, so as to develop/plan a coordinated set of safety measures to manage or to reduce these risks. In addition, the SPP is also in charge of developing safety procedures, offering information and training programmes for workers, being an active part of the OSH management, participating in scheduled meetings and providing the relevant information to workers.

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<sup>1</sup> The committee 'ensures technical and administrative support to run promotional activities targeting small and medium enterprises' ('assicura il supporto tecnico-amministrativo per [...] per le attività promozionali destinate alle piccole e medie imprese' in Italian); available at: <http://www.lavoro.gov.it/ministro-e-ministero/Il-ministero/Organizzazione/Pagine/DG-Rapporti-di-lavoro-e-relazioni-industriali.aspx>, bullet 'r', last accessed 28 November 2017

## Health surveillance

Based on the Legislative Decree of 9 April 2008, No 81, and subsequent amendments, within the general measures for workers' health and safety protection, 'health surveillance' is defined as the set of medical actions aimed at protecting the health and safety of workers in relation to the environment in which they work, to occupational risk factors and to the actual occupational activity they perform. The health surveillance coordinator is in charge of the occupational physician ('medico competente' in Italian). The appointment by the employer of an occupational physician is compulsory when the company is subject to sanitary surveillance, that is, when periodic preventive examinations must be carried out in the company to control the workers' state of health (required by law). For example, the appointment of a competent physician is mandatory in cases of companies with workers who use display screen equipment in a systematic and regular manner for 20-hour weekly averages; workers involved in the manual handling of loads; workers exposed to chemicals, lead, asbestos, noise; and so on.

### 1.2.3 Compensation and insurance bodies

OSH insurance is compulsory for every self-employed person and every employer hiring employees, and protects workers against losses as a result of injuries due to accidents in the workplace, as well as against occupational diseases. The insurance exempts the employer from any civil liability connected to damages or injuries. The employer must report to INAIL on the company's activities, providing all of the information necessary to assess the risks and determine the insurance premium. INAIL, in addition to its workers' compensation activity, aims to ensure the reinsertion of injured workers into working life. Finally, in a preventive effort to reduce accidents, INAIL carries out significant actions aimed at monitoring employment and accident trends, at training and assisting particularly micro, small and medium-sized enterprises, and at supporting companies in their attempts to improve safety (and also economically).

### 1.2.4 Other OSH bodies

There is a plethora of professional associations consisting of professionals/technicians, all of which promote the protection of the environment and safety in workplaces, although to varying degrees.

In the following, a shortlist of key professional associations is reported<sup>2</sup>:

- AIAS — Associazione professionale Italiana Ambiente e Sicurezza (Italian Professional Association for Environment and Occupational Safety);
- AIDII — Associazione italiana degli Igienisti Industriali (Italian Association for Industrial Hygiene);
- AiFOS — Associazione Italiana Formatori alla Sicurezza (Italian Association of Trainers for Occupational Safety);
- AIREPSA — Associazione Responsabili SPP Ambito Sanitario (Association of Responsible SPP Health Professionals);
- AMBLAV — Associazione Ambiente e Lavoro (Association for Environment and Work, also targeting occupational health and safety);
- ANIS — Associazione Nazionale Ingegneria della Sicurezza (National Association for Safety Engineering, also targeting occupational health and safety);
- SIE — Società Italiana di Ergonomia (Italian Society of Applied Ergonomics).

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<sup>2</sup> For further details see: [https://oshwiki.eu/wiki/OSH\\_system\\_at\\_national\\_level\\_-\\_Italy#KEY\\_PROFESSIONAL\\_ASSOCIATIONS](https://oshwiki.eu/wiki/OSH_system_at_national_level_-_Italy#KEY_PROFESSIONAL_ASSOCIATIONS) (last accessed 28 November 2017).



## Research institutes

INAIL's research sector (formerly ISPESL, a separate national institute for prevention and safety at work, 'Istituto Superiore per la Prevenzione e la Sicurezza sul Lavoro' in Italian) plays the most significant role in OSH-related technical-scientific activities including research, experimentation, control, consultancy, assistance and higher training in Italy. OSH-related research is also carried out by universities and by the National Health Institute (ISS, 'Istituto Superiore di Sanità' in Italian).

## 1.3 Social dialogue

At a national and at a local level, two main committees exist: the Permanent Advisory Committee for Health and Safety at Work ('Commissione Consultiva Permanente per la salute e la sicurezza sul lavoro' in Italian) and the Regional Committees of Coordination ('Comitati Regionali di Coordinamento' in Italian).

The Permanent Advisory Committee for Health and Safety at Work lies within the Ministry of Labour and Social Policies. It consists of 10 representatives of the ministries (including the Prime Minister's Office), 10 representatives of the Autonomous Regions and Provinces, 10 representatives appointed by trade union organisations, and 10 representatives appointed by employers' organisations/associations. The Permanent Advisory Committee for Health and Safety at Work aims to raise and evaluate issues concerning the implementation of (OSH) regulations and to provide amendments/improvement proposals, to define promotional activities, to validate good practices, to report on the state of implementation of OSH regulation, to identify good organisation and safety management models, to work on the role of trainers for safety and health at work, and so on.

The Regional Committees of Coordination are in charge of providing guidelines for prevention and surveillance activities at a local level, in compliance with national regulations and following the directions drafted by the Steering and Evaluation Committee for Active Policies. The committees consist of representatives of ASL (local health units), ARPA (Regional Agency for Environment Protection, 'Agenzia Regionale per la Protezione dell'Ambiente' in Italian), the national fire brigade, regional agencies such as INAIL (local agencies), ANCI (National Association of Italian Municipalities, 'Associazione Nazionale Comuni Italiani' in Italian), UPI (Union of Italian Provinces, 'Unione delle Province d'Italia' in Italian), the Maritime Health Authority and port authorities. Moreover, four representatives from employers' organisations/associations and four representatives from trade union organisations are included.

At the workers' level, the Italian system of social dialogue consists of three levels: the cross-industry level, the sectoral level and the company level. This results in the agreement and drafting of Collective Labour Agreements (CLAs). CLAs establish the number of company-level workers' safety representatives (RLS) and their method of appointment, as well as remunerated working time and the instruments to accomplish their tasks; and the number of workers' safety representatives at territorial level (RLST) and their method of appointment.

A shortlist of the key social actors is given below:

- CGIL — Confederazione Generale Italiana del lavoro (Italian General Confederation of Labour);
- CISL — Confederazione Italiana Sindacati Lavoratori (Italian Federation of Workers Union);
- UIL — Unione Italiana del Lavoro (Italian Federation of Labour);
- CNA — Confederazione Nazionale dell'Artigianato e delle piccole e medie imprese (National Confederation of Craftsmen, Small and Medium Enterprises);
- Confesercenti — Confederazione Italiana Esercenti (Italian Confederation of Traders and Hotel Owners);
- Confcommercio - Confederazione Generale Italiana delle Imprese, delle Attività Professionali e del Lavoro Autonomo (Italian Confederation of Commerce Enterprises, Professional Activities and Self-employed)
- Confartigianato — Confederazione Generale Italiana dell'Artigianato (General Federation of Italian Artisans and Craftsmen);

- Confapi — Confederazione Italiana Piccola e Media Industria (National Federation of Small and Medium Enterprises);
- Confindustria (Confederazione Generale dell'Industria Italiana — General Federation of Italian Industry);
- Confagricoltura (Confederazione Generale dell'Agricoltura Italiana — General Federation of Italian agriculture);
- Confimi Impresa (Confederazione dell'Industria Manifatturiera Italiana — General Federation of Italian manufacturing industry).

## 2 Design of data collection

The Italian data collection followed the research design proposed for this work package (see EU-OSHA, 2017a) with two peer dialogue workshops (employers and employers' representatives; and OSH professionals (advisors), plus employers' association experts) and three sector dialogue workshops (representatives from the manufacturing, construction and service sectors, with a focus on cleaning and information technology). There were 18 participants in the workshops, plus the research team members. An INAIL representative was also attending the workshops as an observer. Please refer to Appendices 1 and 2 for details and programmes of the dialogue workshops.

Moreover, to reinforce the findings (as some invited actors and intermediaries could not take part in the dialogue workshops, in particular workers) and to include the workers' perspective, we conducted 10 follow-up interviews (with workers, workers' health and safety representatives, labour inspectors, and trade union health and safety experts) to complement the findings from the dialogue workshops as well as eight additional interviews (with workers' health and safety representatives at area level, an INAIL expert, auditors, advisors and associations' safety experts).

Please refer to Appendices 3 and 4 for details of follow-up and additional interviews.

The aim of the workshops (and follow-up interviews) was to bring different actors and intermediaries together to share their experiences of key success factors and major pitfalls in promoting effective OSH management and prevention actions in the field of OSH in MSEs. The researchers, together with participants, tried to identify areas of consensus and of diverging opinion in the field of OSH in the three sectors to further develop successful sector-specific OSH arrangements that could have significant impacts on health and safety in MSEs.

Knowing that the biggest challenge was securing the involvement of the most interesting company profiles, Confartigianato (General Federation of Italian Artisans and Craftsmen, one of the national employers' associations) was selected to help organise the workshop and get in touch with MSEs and other key stakeholders related to OSH in MSEs. Confartigianato is the largest European association for smaller enterprises, representing more than 1.5 million entrepreneurs and more than 3 million employees. Confartigianato has a very broad representation among MSEs and provides MSE services in Italy with 1,200 offices across the country, covering all three sectors (manufacturing, construction and services) selected for the work package. It is aimed particularly at representing and helping MSEs. In our experience, Confartigianato has a very solid understanding of the needs of the companies it works with, and over the years has established a strong bond of trust with them, as proved by the participation of owner-managers (possibly the most important figure in MSEs as regards health and safety in the workplace).

The workshops were held on the morning of 2 December 2016, and took place at Confartigianato's headquarters in Milan.

### 3 Roles and functions of intermediaries in OSH improvements in MSEs

In the following section, the perceived and/or actual role and functions of each significant group of intermediaries found in the project are reported based on the outcomes of the two peer dialogue workshops, the three sector dialogue workshops, the 10 follow-up interviews and the eight additional interviews, in order to highlight their potential impact on OSH specifically in MSEs. Each section highlights and discusses the main findings.

#### 3.1 Employers

A key finding to emerge from the workshops was that the employers have a very significant role in relation to OSH in Italian MSEs. An employer said in one of the dialogue workshops: 'I never designate another person with the role of RSPP (the person responsible for the prevention and protection service, also called the health and safety manager)'. This seems to sum up the thinking of almost all of the employers (that is, owner/managers) who attended the workshops; in general, they prefer not to rely on an external actor, but aim to handle OSH-related issues themselves, which may make relations with intermediaries more challenging than in contexts where the employers are more likely to delegate the work to others. As established in national legislation, the presence of a health and safety manager (RSPP) within a company is required. The nomination of an RSPP is therefore mandatory in all establishments with at least one employee and is designated by the employer with the function of coordinating the service of prevention and protection against risks. The designation of RSPPs is up to employers but they can cover the position themselves. In any case, the overall responsibility always falls to the employer. In many of the cases studies, the employers were both owner-managers and RSPPs of their companies. The roles of an employer are very varied across the sectors, although employers were identified by each intermediary and by the employers themselves as the central figures and the primary interlocutors with regard to safety at work in MSEs. In practice, the employer has the responsibility of organising and implementing all necessary actions to ensure the health and safety of workers: proper procedures and working methods, the choice of machines and safe equipment, the organisation of offices and production departments, training and more. The identification of risk factors is required by law, with the consequent drawing up of a risk assessment document (DVR). Indirectly, the responsibility of training employees also lies with the employer and if this is not done then the company may not be adequately prepared to manage safety. Combined with a low level of flexibility from the regulatory bodies, the most frequently cited difficulties highlighted by employers were the legislation being 'hard to understand and interpret', and 'unacceptable' fines that are not proportional to the size of the company. If different sectors are compared, however, some differences between employers and the impact on OSH can be seen. The sector-specific characteristics outlined in the following sections are based on insights from the workshops and illustrate how employers face different settings and challenges in the various sectors under scrutiny here.

##### 3.1.1 Employers — construction sector

The strong presence of employers on construction sites is a crucial feature in the sector, especially for the successful outcome of a safety measure. Often, it is difficult for the employer to impose a correct way of working, particularly in cases where the construction company makes use of external work teams, or the employer has to deal with multiple sites simultaneously. It is clear that the constant presence of the employer at all times and in all places is not possible, even though it has been found to be one of the most important determinants of ensuring the implementation of legislation on construction sites. Given that, in practice, it is impossible for employers to control the actions of their workers under all circumstances, employers are not held responsible if the workers have not followed the rules, especially in cases where workers have been trained, informed and provided with all the personal protective equipment (PPE) required by legislation. The employers present at the workshops stated that they believe that they should not be held solely responsible for health and safety. Most of them try to share the responsibility with workers through (as an example) the explicit mention of OSH in their labour

contracts, to better address the workers' behaviour at work (this approach is supported by the constitutional 'obligation of care' to which every worker must refer in Italy, but it does not however guarantee a favourable verdict for employers in the event of a dispute). For most construction companies with an existing service for accident prevention and protection, the site manager plays a supporting role alongside the employer by acting as an interim figure who has the ability to convey specific messages to workers and spur them towards safety, thus attenuating the heavy workload of the employer.

### **3.1.2 Employers — manufacturing sector**

The role of the employer is also of central importance in the manufacturing sector. In this case, however, the employer uses the production system itself, rather than workers, to improve safety. In contrast to what happens on construction sites, the supervision of workers in the manufacturing sector is simpler because the employer can more easily be present in the workplace. Being safe thus often means ensuring that the production system is safe and complies with the law. This could mean, for example, keeping the machine inventory updated, obtaining some kind of certification (even if not directly related to the context of safety but with an effect on it) or, finally, integrating the safety system into the quality system. The main difficulties encountered by employers relate to decisions regarding subsequent updates to the company's production system. When the law is difficult to interpret, however, it can be difficult to know how to update systems. Employers are discouraged from acting when it is not clear whether one investment rather than another would guarantee the fulfilment of legislative obligations.

### **3.1.3 Employers — services sector**

In this sector, the heterogeneity of the various services and, at the same time, the lack of specificity of the legislation in outlining the peculiarities of their different fields of action, make it more difficult to identify the correct measures to take in the field of health and safety in the workplace. In the absence of coherent regulations, the importance of the employer becomes even more marked. The intermediaries present at the workshop were representatives from two main categories of services: cleaning services and information technology. It is clear that these two sectors have very different characteristics, such that a specific regulation for each service should be provided. However, specific regulation for each sector does not exist and often the legislation has been deemed not applicable or inadequate by intermediaries, instead of being tailored to the real needs of the sector and the company size. The difficulties faced by the employer in terms of relating to their workers are stronger than ever. Another fundamental problem that emerged in the cleaning services, which may also be experienced in other subsectors of services, such as catering and hotels, is the strong presence of foreign workers. The construction industry is also affected by this to a certain extent, and it may result in a poor understanding between employer and workers, because of language difficulties.

In the information technology subsector of the services sector, both documentation and the efforts required to comply with the regulations are not commensurate with the actual requirements of the sector and the company. The number of working hours is often high in this sector, and thus the legislation is '*inevitably not observed*' (according to one employer statement during the workshop).

## **3.2 Employers' associations**

Confartigianato, as well as other employers' associations in Italy (for example Confapi — and so on) play a guiding role in explaining and disseminating the key points of the safety system in Italy to workers and employers. The function of these professional associations is that of a service provider for companies. More specifically, the principal functions of the employers' associations encompass collecting problems/requests, providing assistance for companies seeking clarification, providing information and training events in general as well as specifically for OSH, and, of course, representing the interests of companies at political and institutional meetings. Overall, employers' associations show a willingness to work to support companies, and employers acknowledge this important function and very much rely on their help. However, a few discordant opinions were collected during the workshops

and in subsequent interviews. These contrasting opinions result from the fact that the employers' associations tend to preferentially support the companies affiliated to them. As a consequence, this may lead to an alienation from issues of safety for companies that are not affiliated to any association.

### 3.3 OSH professionals (external advisors/advisory companies)

It emerged from the workshops and the interviews that the role of external advisors is to guide companies through the complex Italian regulatory system in the field of accident prevention and protection, and then apply their knowledge and skills to the organisation of the safety system within a company to meet the requirements. Advisors, being qualified in the field of safety, can properly advise and assist their clients in the execution of acts, practices or projects by providing information, advice and solutions through their know-how and problem-solving skills. In Italy, consultancy is typically provided through (often small) consultancy companies that offer such services and rely on one or more advisor, although there are also individual professionals who offer this service. After acquiring the information that characterises a specific customer, the task of the advisor is then to use those elements of their experience, knowledge and professionalism to promote developments concerning safety, for example identifying hidden risks or proposing sound improvement interventions. The functions, in practice, are those of an RSPP or a pure advisor with a collaborative function to support the employer in the risk assessment (i.e. DVR drafting), defining the adjustment measures if needed. All requests for clarification of what and how to do something also fall to advisors. Where a business structure is lacking, advisory support often replaces the roles of the employer itself (rather than being provided in cooperation with the owner-manager) for the performance of certain business safety practices imposed by legislation. This is more often the case for micro and small businesses, whereas companies with more than 40 employees are more likely to have an advisor that acts as a collaborator.

### 3.4 Trade unions

Trade union and other worker representatives did not participate in the workshops because their agendas were at odds with those of the participants. However, the perspective of trade unions was fully covered in the follow-up and additional interviews. Trade unions in Italy play a strong role in defining the collective agreement (labour agreement), but, in practice, their role in OSH is quite limited. This element of weakness is even more pronounced in micro and the 'smaller' (approximately 20-30 employees, in the view of the interviewees) of the small enterprises, where the presence of trade unions is almost non-existent. In fact, the perception of the workers interviewed is that the presence of trade unions is very poor if not completely absent in MSEs. Only in manufacturing did workers actually recognise the presence of trade unions, even though, in their opinion, their actions are often of little value.

Even in the manufacturing sector, it is emphasised that the employer is, or should be, the guiding figure in relation to the application of health and safety at work in micro and small enterprises. In fact, as mentioned above, in the context of micro and small companies, the employer and the RSPP are often the same person. It was considered that, if the attitude of the employer concerning safety is poor, the company is doomed to failure, although one interviewee stated, *'things are getting better and better over time'*.

As regards the difference between the various sectors examined, the construction sector has its own mechanism, which is different from that of the micro and small handicraft and manufacturing sector companies. In the construction sector, labour inspectors can gain direct access to sites without prior notice, thus having better control when it comes to specific calls to perform site checks from the trade unions (in the other sectors, very rigid and time-consuming procedures hinder trade unions from doing this). The service sector, conversely, has been described as 'no man's land' in the sense that neither the Craft Bilateral Body (ELBA, of the Lombardy region) nor the trade unions are able to exercise any type of supervision. This problem arises because there are many, generic subservices in this sector, and targeted agreements between the social partners are still not present, often making it unclear who is responsible for ensuring that OSH obligations are fulfilled.



### 3.5 Other intermediaries

INAIL (the Italian workers' compensation authority) was mentioned in the workshops and interviews mainly with regard to its programmes ISI-INAIL (providing incentives to companies for the implementation of interventions relating to health and safety at work) and OT/24 (providing tariff relief by reducing the national insurance premium rate applied to individual companies); both initiatives take company size into account.

As far as ASL (the local health authority) is concerned, its most influential activities are perceived to be supervision on construction sites (construction industry), accident investigations in the workplace (mainly in the construction sector but also in others) and permissions for the use of basements (services sector). Among these activities, site inspections seem to have the greatest impact in terms of actually enhancing safety in workplaces. No workshop participants or interviewees mentioned the recently established National Labour Inspectorate Agency (INL, 'Ispettorato Nazionale del Lavoro' in Italian), which started operating immediately after the workshops and interviews took place, and which has basically become the main reference authority — together with ASL — as far as labour inspection is concerned in terms of OSH, replacing the role once held by the ministries, INAIL and ASL.

A workers' safety representative (RLS, 'Rappresentante dei Lavoratori per la Sicurezza,' in Italian) was contacted for an interview. The results of this interview were compared with and discussed together with the results of some follow-up interviews carried out with six workers. In all of these cases, in contrast to the trade union context, the workers and RLS were in direct contact with the actual business reality. Even though the importance of their role of sharing OSH-related information within the company so as to improve OSH conditions over time is clear, both workers and the RLS reported often suffering, in general, from business and external pressures and therefore *'not being able to proactively contribute to OSH'*.

An auditor was contacted for an interview. The job of the auditor interviewed was to verify the quality and compliance of the safety management system for companies that require such systems in accordance with the international OHSAS 18001<sup>3</sup> standard (which is also of interest for small enterprises and, in a few cases, particularly in specific sectors and in response to customers' wishes, also for micro-sized enterprises). The interviewee was a qualified auditor who mainly worked closely with MSEs in the following subsectors and types of organisation: metalworking, metallurgy, food, electronics, transportation, petrochemicals, waste, energy distribution and generally low-risk organisations such as cleaning, catering, trade and logistics companies. Different situations were presented to the auditor related to the organisations audited and willing to obtain certification. According to the auditor, there are organisations that see the management system as something that simply monitors legislative compliance. There are other organisations, even relatively small organisations (often in the food or cleaning subsectors), that, instead, have implemented management systems that are definitely valid and constitute prevention tools. The actions that have been most effective are related to the involvement of the workers. The fact that improvement is seen in cases in which the involvement of stakeholders is strong implies that a period of continuing education, awareness and involvement leads to the necessary concentration on safety. There are also cases in which the implementation of an OSH management system has also involved an improvement to the production process (including the customer's production process) because it forces people to think in overall terms. The OSH management system becomes functional according to ISI-INAIL programme standards (based on economic incentives) and OT/24 programme standards (based on the reduction in the insurance premium rate). Nevertheless the majority of companies audited do not implement a management system. The key factor in the successful implementation of a management system seems to be always commitment from the companies' management. The direct involvement of management is a key success factor: *'If management is not involved, the system becomes custom-built with an underpowered engine'* (according to the OSH auditor interviewed). This then also becomes a hampering factor, specifically when the management is not involved but sees the system as only a tool for avoiding sanctions (as the OSH management system allows legal compliance to be managed more easily) and therefore does not

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<sup>3</sup> OHSAS 18001:2007 Occupational Health and Safety Management Certification is an international standard which provides a framework to identify, control and decrease the risks associated with health and safety within the workplace.

perceive non-compliance as '*an opportunity, an incitement for improvement*' such that the system does not work properly. Management systems in the manufacturing sector are fairly simple to implement because there is already a logic of operating instructions in this field and procedures are already relatively well codified. With regard to the services sector, in general successfully implementing an OSH management system is more difficult because the concept of the process becomes inconsistent. The transfer of process logic in the provision of services is also difficult. The factors enabling the full involvement of the auditor are similar to those related to the involvement of management and of the organisation in general. In fact, if the implementation of a management system for safety is seen as an improvement, the auditor's role is easier, more efficient and more effective. If the auditor's presence is seen as a burden and company involvement seen to be of little value, this is detrimental to both the company and the impact of the auditors. Factors that often push a company towards change are, according to the auditor's experience, primarily economic. In fact, injury has a cost for the company, especially in the field of cleaning. The skills and personal qualifications required to practice the profession of an auditor are acquired with years of experience, and include analytical skills and the ability to effectively interface with an interlocutor, and thus the ability to conduct dialogue.

Finally, there was a general consensus in the workshops that MSEs have limited interest regarding the role of the occupational physician.

## 4 Barriers and enablers for intermediaries regarding preventive activities in MSEs

In order to improve the work environment in MSEs, intermediaries face a range of barriers as well as some enablers. In this section, we discuss barriers and enablers in more detail, as they appear in the data collected during the dialogue workshops and the interviews. Before moving to a characterisation of the various barriers and enablers specific to each sector, we want to emphasise that the greatest deterrent from every point of view that emerged during the workshops was definitely linked to economic issues. Today, spending on safety involves investments of a certain importance that will never replace other basic needs of the company, such as the worry of being able to pay employees or questioning the survival of the company itself. This sums up the general view that emerged from the workshops and the interviews. In this context of economic hardship, the fear of having to cease commercial activity is the main concern, and safety priorities become less urgent. Sector-specific considerations of the barriers and enablers are reported first before intermediary-specific barriers and enablers are discussed in the final section.

### 4.1 The construction sector

In the construction dialogue sector workshop, the problem of safety costs was the most significant barrier mentioned, more so than with other industries. The building site example is striking because legislation requires the employers of micro and small companies to equip their workers with the same measures as those required for large enterprises on large building sites. In general terms, '*the law provides absolutely equivalent obligations in relation to absolute total cost: the safety obligations should instead be arranged and customised for MSEs differently from larger companies in order to reduce their costs (and not their safety because of the costs, as it happens usually)*' (this was specifically emphasised by an owner-manager, but the concept was confirmed by all the participants, thus allowing it to be generalised).

Among the various good practices identified and listed in work package 3 (EU-OSHA, 2017b), the assistance provided by consulting firms is definitely worth note, especially when imposed by a client (so taking place at all the times requested), for the micro and small contractor companies operating on a job site, in terms of the management of verification and the documentation of technical and professional competence. This practice has led to the direct involvement of all micro and small companies on the construction site that, in turn, have actively made efforts to properly manage this documentation (as required by the law). The practice produces a formal and substantial qualification of the contractor and

also creates a virtuous mechanism through which a retention of the client and the contractor together for future collaborations takes place. This practice was in fact repeatedly mentioned during the workshops, but mainly in relation to the construction sector. It is not clear if such a supply chain mechanism may in principle be 'adapted' to other industries, but it seems that this case is really forced by sector-specific problems.

Another interesting practice, that sometimes takes place as a voluntary agreement, which involves different types of intermediaries, is the creation of a working group that includes employers in the construction industry together with regulators, employers' associations, and joint training and consulting institutions (respectively ASL, Confartigianato and the CPT, that is, the regional/territorial joint committees on safety and health in the workplace in construction). The outcome of forming a working group such as this is the formulation of supporting guidelines, agreed with the controlling authorities, to be followed on construction sites with the purpose of reducing pressure during an inspection. These guidelines help enterprises to be aware of all the requirements and to better understand the actions that need to be undertaken, thus really supporting enterprises. Nonetheless, there are sometimes interpretation issues in relation to those guidelines (for example some employers have clashed with the control body during verification inspections because the established guidelines were not always perfectly calibrated with the legislation in its entirety). The partial non-objectivity of legislation and partial alignment with the control bodies are deemed to be strong inhibitive factors in this type of initiative, although a generally good level of efficiency of the practice was pointed out.

The state of the construction site working environment should be checked every day in order to understand whether or not the way of working is correct. This is not true for companies in any other sector because, for example in the manufacturing sector, production facilities remain unchanged for months or years. The same could be said for the service sector as well. On a construction site, however, the risk scenarios and actions to be taken should be monitored every day. In this context, the CPT carries out monthly checks, supporting construction sites at no cost. This type of practice is perfectly suitable to the types of scenario typical of companies in the construction industry. However, the dissemination of this type of practice to the manufacturing or service sectors is not recommended because, as explained above, it would be less feasible.

A programme that attracted particular attention throughout the workshop was the already mentioned ISI-INAIL programme based on economic incentives to companies to improve health and safety at work. This programme is rarely used in the construction sector, but ISI-INAIL has great potential in this field too. In fact, the factor obstructing a high uptake of this programme in construction is related to the fact that the economic incentives, although designed for very different companies, are probably not tuned for use by construction companies. In fact, the construction sector requires a higher level of training than other areas, but this consideration does not fall within the parameters with which the Notice chooses companies to provide economic incentives. The barrier — as emerged during the discussion — is the careful planning of the announcement, which should distinguish more strongly by sector and by type of activity in order to make companies comparable and therefore able to access funds equally regardless of the sector.

A general finding in the construction sector is the strong presence of training and refresher courses required by law for both employers and their employees. This huge demand for training by companies operating mainly in the construction sector has led to the rise in Italy of several possible ways to deal with it. Training courses are being distributed in different forms and through different methods by employers' associations, trade unions, bilateral bodies, consulting companies and also by the regulatory authorities. Generally, however, these courses are very expensive and certainly not tuned to the actual available resources of MSEs, which are far fewer than those of large construction companies. The excessive number of courses therefore involves a considerable waste of resources by companies, in terms of both cost and time. This situation results in a loss of competitiveness in the labour market for companies that often invest in training and refresher courses, as safety is not always acknowledged as a competitive advantage. The excessive cost of the courses is thus a barrier because it prevents MSEs from taking part. In addition, with regard to the management of training courses, an employer can be a strong enabler for workers in the learning of technical issues during training courses. In this sector, a good practice identified was the active participation in the training courses of the employer together with



their workers. Such shared education between employer and workers results in a strong source of stimulus for the workers, as it shows an attitude more inclined to learning.

Finally, a typical barrier in this sector, but also present in the cleaning subsector of the services sector, is the growing incidence of illegal work. While illegal work could be seen as an opportunity for companies to save costs (while denying rights), in the long term it is deemed to be a major source of loss of competitiveness for companies that follow the law (including with respect to safety regulations). At the same time, illegal work is very often linked to poor working conditions and unsafe workplace practices (EU-OSHA, 2016).

## 4.2 The manufacturing sector

In the manufacturing sector, the permanent features of workplace settings (for example machinery, people, procedures, contexts) define the work environment usually over a longer time frame than in the other sectors investigated. Consequently, in the manufacturing sector, a company could take decisions and act within more foreseeable scenarios. This feature of the sector is deemed to be an enabler, or, perhaps more accurately, to not act as a barrier to OSH improvement interventions.

Moreover, in the manufacturing sector, there is a greater presence of technological equipment in the workplace than in other sectors, with all its implications around safety. This implies a simpler (at least from the decision point of view) process: safety improvements result from the improvement of equipment and thus also from its economic evaluation. This same feature often implies a higher risk for workers related to equipment, which is usually tackled with training (which, in turn, tends to be procedure based).

During the workshop, there was a general consensus that the legislation is sometimes unclear and, because of the characteristics of the manufacturing sector, employers risk intervening when the law does not explicitly require it (an especially important point for MSEs because of their inherent scarcity of resources). This appears to be a barrier to the motivation to update the production system (and, thus, improve safety). In fact, the employer is often reluctant or confused when purchasing new equipment because of the potential harm of spending large amounts of money on improvements that regulations might not recognise.

Moreover, the characteristics of the manufacturing sector call for a more specific type of training on working with and using equipment; such specificity is not usually present in the mandatory (by law) courses, and makes those courses with their general information quite ineffective for improving safety in this context. However, external programmes, such as economic incentives for companies (ISI-INAIL programme) or a reduction of the insurance premium rate (OT/24), both designed to economically support enterprises' implementation of OSH improvements, have gained wide acceptance, especially among MSEs. In fact, these two programmes support companies that opt for the replacement or the purchase of new equipment, lowering the owner's risk as described above. In conclusion, financing instruments that facilitate the business evolution process would certainly benefit all sectors, especially in terms of OSH improvements, but especially the manufacturing sector, which makes extensive use of equipment.

An important element that surfaced in the manufacturing dialogue workshop was related to the achievement of certifications (ISO 9001, ISO 14001, ISO 27001) and/or the implementation of management systems, including those that do not always strictly concern safety. The advantage of obtaining certifications, such as ISO 9001 (a quality management system), is the time savings generated. In particular, the quality management system provides a number of standardised procedures that allow the working environment, including safety, to be controlled from every point of view. It is also beneficial to implement a safety system through the quality system, because the legislation does not suggest how to fulfil the legal requirements on safety in the workplace. The savings in terms of time and money, which are the enablers of this type of intervention, take place in the implementation of a single standardised manufacturing process, which involves different regulatory obligations, including, presumably, those on safety.

### 4.3 The service sector

The fundamental feature of the service sector, in particular of the cleaning industry and information technology service industry, is that it relies more than others (for example manufacturing) on human resources. However, if this feature is common to many of the service sector's subsectors, some relevant differences and problems related to safety become apparent. As an example, the cleaning industry — with low entry barriers for workers, as no qualifications and no specific skills are required, often limited career development and a wide variation in terms of the multicultural origins of workers (which could potentially lead primarily, but not only, to language difficulties) — faces many issues in setting the right level of training in relation to the work and safety culture. By contrast, in information technology services — with the highly skilled and highly qualified workforce — each worker has an in-depth competence that is an integral part of the service delivered to the customer; this level of competence also improves the service expected and embeds a safety culture more effectively. In other services, the situation is different again. For example, in the field of hairdressing, there are cases where the employee sets up a personal relationship with the employer, considering this employer as a 'guru', a master from whom he or she can learn, so that all the characteristics (including the safety culture) of the employer are copied by the employee. The examples given above indicate how the relationship between worker and employer can change from service to service and therefore that they should be tackled specifically in order to be effective. Unfortunately, as agreed by all the participants in the workshops and in the interviews, these hard differences among subsectors are not identified or covered from a legislative point of view. This misalignment results in excessive and useless bureaucracy, huge costs and often heavy penalties, and, in the end, in a lack of trust among MSEs.

A specific, but significant intervention highlighted during the workshop in relation to cleaning services was how one company, with the aid of an external advisor, created a specific evaluation system for biomechanical overload risk, which is an emerging risk associated with this specific activity. The same company also intervened with the implementation of a management system, which reduced the injury rate by 60 % within 4 years. These interventions were dictated by the need to control occupational diseases resulting from the overload of the upper limbs, which, especially in a cleaning company, are also a debilitating problem for the purposes of the service provided. Frequently, the inspiration for certain solutions is a result of the need to maintain production requirements. If a worker is affected by a disease that damages their musculoskeletal system, their productivity is reduced. The pressure to prevent the disease is not then dictated by safety but by the need to provide the required productivity, so this is a driver for change. However, if workers within a company have a very clear idea about potential occupational diseases, it is also an enabler because it leads to the greater involvement of workers who understand the value of safety. Relevant interventions in the information technology (IT) sector that have led to improvements in health and safety were not identified. In the IT sector, the safety issue is the hours spent sitting in front of a computer. Any action that allows a worker to leave their working position for a few minutes, moving away from the computer, is an action that can be considered positive, but is usually considered to have a negative impact on productivity.

### 4.4 Intermediary specific

The role of employers' associations (and, in particular, of Confindustria) deserves special attention. This employers' association plays an important role for companies, with the aim of explaining the key points of safety to employers and workers. This is carried out in a range of ways: visits, information materials, training courses, and so on. In a nutshell, the main contribution of the employers' association is daily contact and support, staying in touch with the MSEs and understanding what their needs are. The employers' association's competences are, above all, the ability to interpret and communicate the regulations, as the law is often not adapted to different situations and safety in MSEs suffers in a completely different way from that in large companies. The skills mentioned above have applications in transferring information to companies so that they are informed about legislation, new rules and changes. The employers' association also plays an important role regarding the value (real and perceived) of safety. In summary, it seems that the employers' associations have the ability to provide usable, concise and accurate information on safety and the law in general that is necessary for MSEs. MSEs should perceive and deal with safety as an opportunity, or at least not only as a waste of time

and a burden. When companies are able to do this, advisors and other intermediaries will encounter fewer obstacles in carrying out their functions. It seems that employers' associations could offer a means of bringing businesses closer to this cultural change. Employers' associations definitely exercise great influence, enabling the company, employer, employees and the safety system as a whole to move towards improved health and safety conditions in the workplace. Nevertheless, we should not forget that the ultimate decision to join an employers' association is up to the individual employer. The employer, as in relationships with other intermediaries, is therefore the key factor as either an enabler of or barrier to interacting with various intermediaries. The enabling element is the action to be undertaken by the employer to inform the employers' association about his or her company's needs; the barrier element, which creates the disconnection with employers' association, would be if this information is not given.

Another key intermediary with a similar function to that provided by employers' associations is the OSH professional (advisor). While the key role as an enabler is already clear, in this section we want to pay more attention to how this role can act as a barrier. The workshops, and also two additional interviews, revealed that an advisor may be reluctant to properly inform an employer about the activities carried out by other intermediaries, such as an employers' association, bilateral bodies and other support agencies. The activities carried out by an employers' association, for example, are often equivalent to those provided by the advisor, with the important difference that the membership of employers' associations implies only a very small cash outlay, so that the advisor could find themselves no longer required. In fact, this attitude is not only held by some advisors, but by all those intermediaries that require money in exchange for a service. We want to clarify, however, that this situation is dictated more by the current economic crisis than by a basic problem in the culture of work in Italy.

As highlighted during the workshops and interviews, trade unions in Italy, in relation to MSEs, carve out a less incisive role than the role they have within larger companies, which is often at area and/or industry level, and is only related to negotiations concerning bargaining agreements. However, trade unions are often involved in mandatory safety training courses.

Employers in MSEs are considered the focus of the safety system, as far as the enabling or disabling interactions among intermediaries are concerned. The employer has a central role as the main company decision-maker, also on safety. The more the employer is reluctant to change, the more intermediaries in the circle must collaborate or act together as enablers to 'shake' the employer towards improved health and safety conditions in the workplace.

## 5 What works for whom — and why?

Based on the results of the workshops and the interviews reported earlier, in the following section the key mechanisms identified as pushing for change are described.

### 5.1 Regulations

There was a general consensus in the dialogue workshops about the key mechanism that drives MSEs to take actions/implement interventions/organise programmes on health and safety in the workplace, and that is the fulfilment of legal obligations in order to avoid incurring sanctions. The fear of inspections and sanctions is definitely one of main enablers leading to a change of vision towards safety. A less selfish point of view that partly emerged was that many employers claim that the health and safety of their workers is their main concern and goal, and, when this is the case, the company often also operates in accordance with the law and therefore presumably its workers are 'safe'. The prevailing ethical beliefs of the employer are therefore another trigger for safety measures. Concern for the reputation of the organisation was almost never emphasised in the workshops, an issue which instead is more apparent when discussing medium-sized enterprises.

However, the presence of an articulated complex regulatory system does not always lead to a mechanism for success. Indeed, one of the factors that hinders a true change regarding safety is the lack of trust in institutions, especially those of the control bodies. The legislation is often considered too vague and difficult to interpret objectively, and there are many cases in which the control bodies seem

to act by interpreting the regulations as restrictively as possible (disregarding other important factors, also affecting, in turn, OSH conditions), and, involuntarily, acting against the good of the company. There are several examples in which, according to some of the employers surveyed, *'the control bodies exist to make money'* (that is, by fining enterprises) as *'in the end we don't know exactly what to do'* (that is, enterprises are not sure how to intervene). This is true even when working groups (as reported above) have been set up together with the same control bodies to establish guidelines for making the company safe. All those issues can, to some extent, be ascribed to the objective difficulty of the right interpretation (and application) of law/regulations, affecting all the actors and intermediaries (including control bodies), and especially MSEs. For one reason or another, this ultimately has a very negative impact on the implementation of business safety, and employers, in order not to attract the attention of the monitoring authority, often give up asking for assistance. In the opinion of employers attending the workshop, unclear rules in legislation that are followed by inadequate sanctions or sanctions that are often not proportionate to the company's size are experienced mainly in the construction industry, where, compared with other sectors, the context (that is, the site) evolves and changes more rapidly.

## 5.2 Incentives

The already mentioned INAIL programme of incentives to companies (ISI-INAIL) and the reduction of the insurance premium rate (OT/24), both designed to support the implementation of OSH improvements, are acknowledged as the best ways to effect these in the context of economic incentives to MSEs, both from the point of view of investments (there were 80,000 requests in the period from 2011 to 2014 and 23,000 requests in 2015 alone for the ISI-INAIL programme) and from the point of view of the funds made available (as an example, more than EUR 276 million was made available in 2015). However, both programmes also received some negative judgements in the dialogue workshops and interviews. First of all, the procedure by which companies can access funding is considered permanently affected by the order of arrival of requests to INAIL. This procedure was described during the workshop as a *'real lottery'*, which definitely dissuades companies from joining the programme. In fact, joining the call to receive funding is neither an easy road nor even free of cost. The ISI-INAIL programme in fact requires some degree of preparation, which, among many other things, also requires the intervention of an external advisor both for the compilation of reports and to check the requirements for access to funding. Taking part in the programme is perceived, to some extent, as a process with *'certain costs but uncertain benefits'*, which implies a low level of accessibility. In fact, all of the work done then undergoes the *'click-day'* procedure: the company that submits (*'clicks'*) the request first on the call website on a predefined day is awarded the incentive, regardless of the quality of the project. Nonetheless, the ISI-INAIL programme has, as the numbers show, a very strong impact in Italy and definitely seems to be a factor pushing towards change in MSEs, especially in the manufacturing sector, as the ISI-INAIL programme particularly promotes the renovation/replacement of equipment, which is in line with the needs of manufacturing companies.

In the construction and services sectors, the implementation of improvements to health and safety does not go hand in hand with a company's technical progress, thus the ISI-INAIL programme tends to be less useful for companies that want to access funding in these sectors. In these sectors, the risk of losing a contract when the company fails to meet the contract's requirements is well known (the contract would be granted to another, better performing company, with a loss in terms of revenue). A strong incentive for safety therefore occurs when OSH requirements are a condition of the execution of a contract. However, this calls for the client or customer to be attentive towards safety matters, which in many instances is not the case.

By and large, the workshops showed how the manifestation of an accident triggers an owner's willingness to take action on workers' safety. This mechanism appears to be largely due to sudden awareness on the part of the owner and less due to the possibility that hypothetical subsequent accidents may affect the company's image. In the case of the service sector, the high rate of accidents caused by overloading the lower limbs has prompted employers to take action to implement a new safety management system, which has reduced the injury rate by two thirds in 4 years. It is evident that an injury rate so high is debilitating in terms of expected output, especially in the construction and cleaning sectors, which usually make greater use of human resources.

The manufacturing sector has been observed to have made a greater use of certification systems (for example ISO 9001, ISO 14001, ISO 27001) and/or has undertaken the implementation of management systems, which, however, do not always strictly concern the field of safety (that is, a quality management system and an environmental impact management system). Certifications or the implementation of a management system (not specific to safety) are probably the largest incentives for the improvement of the working environment, and in particular of OSH conditions, in MSEs in the manufacturing sector. Seeking higher performance in production drives the company to try to get certifications and/or the implementation of a management system (in many cases the implementation is a strict requirement from clients). The certification and implementation of management systems simplifies the role of employers as they intrinsically promote the creation of standardised procedures, productive apparatus streamlining and process rationalisation that leads, inevitably, to an improvement in the conditions of the working environment and therefore also the safety level. This type of driver proved to have good results not only in the manufacturing sector but also in some fields of the service sector. The certification has a low rate of adoption in the construction sector, where the pursuit of certification (very costly for MSEs) has led to a disproportionate investment of resources, has resulted in little success in obtaining new contracts, and is actually debilitating construction companies as the sector is experiencing more financial difficulties than other sectors.

### 5.3 Training

By and large, the workshops revealed how, through training courses, the employer and the workers acquire an improved awareness of situations of irregularity and risk factors, which can lead to significant improvements in the company. Both workers and the employer tend to adjust to new information, trying not to run certain risks. In this situation, it is always the injury factor that triggers change. In this case, however, the purpose is to prevent accidents by informing the employer and the employee about the potential consequences of poor attention to safety, for the company and for individual health.

Training was also a driver that was much discussed throughout the workshop, but a general finding was that training is required for both the satisfaction of legal requirements and to bring benefits to the company. This conclusion is true for each of the three sectors, although it has been shown that the need to train workers in the cleaning (service) and construction sector is even stronger. However, a situation of discontent has been emphasised once again, connected to the complexity and non-specificity of the legislation in this regard. Indeed, it was emphasised more or less unilaterally in the dialogue workshops and in the follow-up interviews that general training is not effective because it often does not address the real needs of the worker, and is also resource consuming. Several employers, as well as advisors, argued that training should be more specific to the sector and to the particular task performed by the worker. Finally, there was a particular consensus about the point that legislation should recognise training as something that leads to a cultural change in people's minds, passing from current training to a similar educational concept.

## 6 Identified shared understandings and divergences among the stakeholder groups

In the national dialogue workshops, the stakeholder groups agreed in general on the current functions of intermediaries, as well as on most of the barriers and enablers identified for the intermediaries that approach MSEs. There were no major disagreements between the participating intermediaries in the dialogue workshops or in the follow-up and additional interviews.

Some key points on which the various intermediaries were most in agreement are listed below:

- Awareness of the risk of inspections and sanctions is definitely one of the causes (that is, enablers) of a change in vision on safety. On the other hand, many employers say that their goal is knowing that the company is operating in accordance with the law and that therefore



presumably its workers are somehow 'safe'. The trigger for safety measures is, thus, the prevailing ethical beliefs of the employer.

- One of the factors that hampers true change is the lack of trust in institutions, especially in the control bodies. There are many cases in which the control bodies, especially where legislation is vague, seem to act by interpreting the regulations as restrictively as possible. At the same time, enterprises are left without any useful feedback on how to intervene in order to make sure they are compliant with the legal requirements. When this is the case, the control bodies are perceived as acting against the good of the company. This can be true even when working groups have been set up together with these control bodies to establish guidelines for making the company safe. All of these issues can, to some extent, be ascribed to the difficulty of interpreting law and regulations (as well as their application), affecting all the actors and intermediaries (including control bodies), and especially MSEs. This fact has another negative and insidious impact on the implementation of business safety: the employers, in order not to attract the attention of the monitoring authority, often 'give up' asking for external assistance, meaning that they, as one of the main actors in company safety, pay less attention to safety matters.
- Clients and/or customers seem to be strong enablers in all the sectors considered, but in different ways. In the construction and service sectors, contract requirements in terms of OSH, as a condition of the execution of a contract, are a strong incentive for safety, but of course it requires a client/customer to be sensitive to safety as an issue, which is not very often the case. In the manufacturing sector, clients/customers requesting certifications (quality, environmental, and so on) and/or implementation of management systems (not always strictly concerning the field of safety) are probably the largest incentives for the improvement of the working environment, and in particular of OSH conditions, in MSEs, promoting the creation of standardised procedures, productive apparatus streamlining and process rationalisation.
- Employers' associations are crucial in the development of business safety because they provide tools and advice to companies essentially free of charge. An association acts as a stimulus and is a source of continuous information, training and practical tools.

## 7 Conclusion

There may be some limitations to the findings of the current research, as most of the participants representing owner-managers in the dialogue workshops were members of Confartigianato. This suggests that the workers and employers involved are a sample that is not entirely representative of the total population, in that they were already attentive to the issues of health and safety at work. This implies that, in some of the contexts discussed, the experiences collected were, of necessity, shared (which in fact made the work, at least from the point of view of the research team, simpler). The views and opinions of people 'not sensitive' to health and safety at work are more difficult to obtain and perhaps unattainable with the current strategy used for data collection. Nevertheless, the knowledge and skills of the persons interviewed in relation to health and safety in the workplace represented a broad range of the relevant actors, to the extent that we believe that the findings that emerged during the workshops and in the subsequent interviews reflect the actual situation in Italy.

The national dialogue workshops and the follow-up and additional interviews have shed light on a number of shortcomings (but also some good 'working ideas') in the Italian OSH system, and also on several programmes and practices. Moreover, they contribute towards a better understanding of several features of the intermediaries in promoting effective OSH management and prevention actions in the field of OSH in MSEs from different sectors. The dialogue workshops also allowed us to understand the main differences among the sectors investigated, and the roles of different OSH actors. The discussions in the workshops and during the interviews highlighted that the owner-manager plays the main role in influencing OSH and safety standards within MSEs. This is because the overarching majority of the decision-making processes about any kind of actions to be undertaken (that is, power) are made by the owner-manager, but also because, as is typical within MSEs — which lack any intermediate hierarchical

level — all of the workers look to the owner-manager for his or her commitment, involvement and example. Thus, all the main enablers of safety improvements identified (request from the customer, control from the labour inspectorate, accessibility of OSH experts, training and help from associations, and so on) pass through the owner-manager. MSEs are described as 'risky' enterprises in terms of workplace safety (EU-OSHA, 2016); this reflects the lack of interest in OSH in general and the limited resources provided for the field of OSH by the owner-manager. It is evident that employers, especially in MSEs, need incentives (mainly economic, but also in terms of availability of expertise and means) to become interested in health and safety issues in order to be willing to deal with and invest more in OSH. On the other hand, MSEs seek easy, cheap, practical and simple solutions in order to comply with OSH regulations. The role and possible actions of intermediaries could assist MSEs significantly with such compliance. Efforts to improve OSH adopted in larger enterprises currently appear not to be transferable to MSEs, but the importance of customers and clients can potentially be utilised as a driver to improve OSH.

Italy has moved from a prescriptive legislative system, where the rules were established and ordered backwards and forwards, explaining exactly how various work and production processes (in relation to, for example, machinery, equipment and facilities) should be organised and handled, to the current legislative system that states what must be achieved but not how to achieve it. Freedom of action is now greater because norms and rules are not completely prescribed, but this assumes that safety is approached in a way that puts greater responsibility on the company regarding what it has to provide in terms of a safe working environment. However, Italy is currently in between these two approaches to regulation, which is disadvantageous because one approach is prescriptive and the other approach demands certain safety standards be kept. We must therefore find a way to ensure the correct application of safety measures. It may be necessary to start with information and culture programmes on safety at primary schools and then develop this throughout the entire course of curricular study. It would be a start to think in terms of safety education. In this way, the culture of safety would be instilled into each individual worker and employer, drastically raising the level of safety in the workplace.

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## 9 Appendices

### 9.1 Appendix 1. Programmes for national dialogue workshops

Before the workshops took place, there was a plenary introduction and presentation for all participants, in which the content and planning of the dialogue workshops were shared and discussed, so that all of the participants were aware of the activities and the content to be presented and discussed. The participants were then divided into groups in order to take part in the different workshops, and each participant was asked to present his or her experiences and thoughts and to discuss those of the other participants. A research subteam was assigned to each dialogue workshop to facilitate discussion. Every subteam included one senior researcher, who moderated the dialogue and guided questions for the discussion, one junior researcher and one engineer, who were appointed to take notes, and record and produce a short summary of the discussions in each session. A final summary was produced, based on these notes. Moderators used the lunch break after the sectoral discussions to prepare a short presentation of the workshop results. The final summary was circulated among the participants in the dialogue workshops, who were asked to comment on it. The final step was a plenary discussion to explore the topics on which there was consensus, and where there were diverging opinions between the various actors and sectors. A research subteam was also present in the final plenary session to facilitate discussion; this subteam included, again, one senior researcher, one junior researcher and an engineer, who took notes, and recorded and produced a short summary of the discussions. An analytical meeting was held with the whole research team, to discuss the general findings of the workshops; at this meeting, each subteam presented a short report of the most relevant findings. A final draft report was then circulated among the research team for comment, and necessary edits were made so that the perspective of all the researchers actively involved in the research were included.

### 9.2 Appendix 2. List of participants in workshops and focus group interviews

- Workshop, manufacturing sector, 2 December 2016:
  - manufacturing packaging enterprise owner, 8 employees;
  - metal-mechanic company owner, Health and safety manager, 10 employees;
  - furniture company owner, Health and safety manager, 10 employees;
  - treatment and metal finishing company owner, H&S manager, 9 employees;
  - innovation and networks responsible in Confartigianato, Lombardia;
  - competitiveness manager at Confartigianato, Lecco.
- Workshop, construction sector, 2 December 2016:
  - construction company owner, surveyor of building site, technical officer and Health and safety manager, who works with teams every day and coordinates with respect to safety;
  - construction company owner, Health and safety manager, 3 employees;
  - consulting company manager in the construction, manufacturing and service sector;
  - manager at Confartigianato, Lombardia, in the construction and manufacturing sector.
- Workshop, service sector, 2 December 2016:
  - hairdressing service owner, Health and safety manager, 2 employees;
  - cleaning company owner, Health and safety manager, 70 employees;
  - Information and communications technology services owner, Health and safety manager, 3 employees;
  - Information and communications technology services owner, Health and safety manager, 3 partners;
  - cleaning company owner, Health and safety manager, 16 employees;
  - multiservice company owner, 70 employees;

- external Health and safety manager and business advisor in manufacturing and services sectors;
- manager at Confartigianato, Lombardia, in service sector.

### 9.3 Appendix 3. List of follow-up interviews

- Worker in a manufacturing company. The interview was conducted by telephone, lasting approximately 35 minutes. The call was held on 19 December 2017 at 2 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker in a manufacturing company. The interview was conducted by telephone, lasting approximately 30 minutes. The call was held on 19 January 2018 at 3 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker in a construction company. The interview was conducted by telephone, lasting approximately 25 minutes. The call was held on 20 January 2018 at 11 a.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker in a construction company. The interview was conducted by telephone, lasting approximately 35 minutes. The call was held on 20 January 2018 at 12 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker in a service company. The interview was conducted by telephone, lasting approximately 30 minutes. The call was held on 25 January 2018 at 10 a.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker in a service company. The interview was conducted by telephone, lasting approximately 35 minutes. The call was held on 25 January 2018 at 12 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Workers' health and safety representative (RSL in Italy) in a metal-mechanic company. The interview was conducted by telephone, lasting approximately 40 minutes. The call was held on 19 December 2017 at 4 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Trade union representative with institutional function with priority to orientation, training and qualification of workers. The interview was conducted by telephone, lasting approximately 30 minutes. The call was held on 19 December 2017 at 3:30 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- ASL inspector (Labour Inspectorate) for the manufacturing sector. The interview was conducted in the offices of a construction site, lasting approximately 30 minutes. The interview was held on 23 January 2018 at 3 p.m.
- ASL inspector (labour inspectorate) for the construction and service sector. The interview was conducted in the offices of a construction site, lasting approximately 30 minutes. The interview was held on 23 January 2018 at 3:30 p.m.

### 9.4 Appendix 4. List of additional interviews

- Worker's health and safety representative (RSLT in Italy) who is involved in the system of the bilateral body ELBA (Craft Bilateral Body of Lombardia). The interview was conducted by telephone, lasting approximately 35 minutes. The call was held on 19 December 2017 at 5 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Worker's health and safety representative who is a member of a bilateral body with tasks focusing on the service sector. The interview was conducted in the offices of a construction site, lasting approximately 30 minutes. The interview was held on 23 January 2018 at 10 a.m.

- Worker's health and safety area representative who is part of a bilateral body with tasks focusing on the construction sector. The interview was conducted in the offices of a construction site, lasting approximately 30 minutes. The interview was held on 23 January 2018 at 10:30 a.m.
- INAIL engineer with institutional functions in the assessment of risk prevention, assessment of ISI-calls, evaluation of OT/24 and drafting guidelines for management projects. The interview was conducted by telephone, lasting approximately 55 minutes. The call was held on 15 December 2017 at 5 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Auditors for a body of worldwide certification whose function is to be responsible for the audit team with the purpose of verifying the quality of and compliance with the safety management system for companies that request it. The interview was conducted by telephone, lasting approximately 30 minutes. The call was held on 12 December 2017 at 6:30 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Advisor and trainer in the field of safety in the workplace in a service provider company who deals, specifically, with the technical documentation of the manual handling of loads, fire assessment, video terminal evaluation, work-related stress, and so on. The interview was conducted by Skype, lasting approximately 50 minutes. The call was held on 14 December 2017 at 3 p.m. from the headquarters of the Department of Management Engineering at Politecnico di Milano.
- Responsible individual from Confartigianato Pavia, with 'confidant' function for companies, whose primary functions are to contact customers rather than visit them for new contracts and new subscriptions to Confartigianato, organise training courses and advise businesses about them, and then, more generally, disseminate and promote the activities of Confartigianato Pavia. The interview was conducted in person, lasting approximately 65 minutes. The interview took place on 14 December 2017 at 10 a.m. in Confartigianato Pavia's headquarters, Viale Cesare Battisti, 76-27100 Pavia.

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